

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

ASSOCIATED RECOVERY, LLC, )  
                                )  
                                )  
Plaintiff,                 ) Case No. 1:15-cv-01723-AJT-JFA  
                                )  
                                )  
v.                            )  
                                )  
JOHN DOES 1-44,            )  
                                )  
                                )  
Defendants *in rem.*      )

In re:

744.COM	KXW.COM	UHW.COM	YJX.COM
028.COM	LNM.COM	VCZ.COM	YLZ.COM
3DCAMERA.COM	LUOHE.COM	VGJ.COM	YQP.COM
FNY.COM	MEQ.COM	WYD.COM	YQT.COM
FX2.COM	OCU.COM	XAQ.COM	YRN.COM
FXF.COM	PIXIE.COM	XFF.COM	YTE.COM
JTZ.COM	QMH.COM	XSG.COM	YYG.COM
KGJ.COM	RUTEN.COM	YCX.COM	ZDP.COM
KMQ.COM	SDU.COM	YEY.COM	ZHD.COM
KOU.COM	SQG.COM	YGX.COM	ZULIN.COM
KXQ.COM	TAOLV.COM	YJR.COM	ZZM.COM

**CERTAIN DEFENDANTS' MOTION TO DISMISS COMPLAINT FOR FAILURE TO JOIN A NECESSARY PARTY, OR IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendants Jinwu Chen (meq.com), Xumin Huang (yjr.com), Feng Lu (sqg.com), xsg.com, zdp.com, ycx.com), Yuhua Jiang (yqp.com, ygx.com, qmh.com, yqt.com), Zhilong Chu (pixie.com), Yaoguang Zhu (028.com), Yanbin Li (wyd.com), Yu Lin (kxw.com), Xiaofeng Lin (kmq.com, xaq.com, kxq.com, lnm.com, kgj.com), Genjing Zhen (luohe.com), Xiaoying Li (zzm.com, xff.com), Liwei Liu (yyg.com), Dongdong Xu (yrn.com), Teng Wang (vcz.com),

Yang Gao (fny.com), Xiaohang Shen (zhd.com), and Feng Yan (zulin.com) (collectively “Certain Defendants”), by counsel, hereby request pursuant to Rule 12(b)(7) of the Federal Rules of Civil Procedure and 28 U.S.C. § 1404(a), that the Court dismiss the complaint, or in the alternative, transfer the case to the United States District Court for the Northern District of Texas. The basis for this motion is set forth more fully in the accompanying Memorandum in Support of Motion to Dismiss Complaint for Failure to Join a Necessary Party, or in the Alternative, to Transfer Venue.

Counsel for Certain Defendants met and conferred with counsel for Plaintiff in person on March 18, 2015 and by email earlier this week regarding the relief requested in this Motion, and the parties were unable to narrow the areas of disagreement.

WHEREFORE, Certain Defendants respectfully request that the Court grant this Motion.

Dated: March 25, 2016

Respectfully submitted,

/s/ Eric Y. Wu

---

Lora A. Brzezynski, VSB No. 36151

Claire M. Maddox, VSB No. 71230

Eric Y. Wu, VSB No. 82829

Dentons US LLP

1900 K Street, NW

Washington, DC 20006

202-496-7500 (phone)

202-496-7756 (fax)

[lora.brzezynski@dentons.com](mailto:lora.brzezynski@dentons.com)

[claire.maddox@dentons.com](mailto:claire.maddox@dentons.com)

[eric.wu@dentons.com](mailto:eric.wu@dentons.com)

Of Counsel:

Steven M. Geiszler

Zunxuan D. Chen

Dentons US LLP

2000 McKinney Avenue

Suite 1900

Dallas, TX 75201-1858

214-259-0900 (phone)

214-259-0910 (fax)

[steven.geiszler@dentons.com](mailto:steven.geiszler@dentons.com)

[digger.chen@dentons.com](mailto:digger.chen@dentons.com)

*Counsel for Domain Names 028.com,  
fny.com, kgj.com, kmq.com, kxq.com,  
kxw.com, lnm.com, luohe.com, meq.com,  
pixie.com, qmh.com, sqg.com, vcz.com,  
wyd.com, xaq.com, xff.com, xsg.com,  
ycx.com, ygx.com, yjr.com, yqp.com, yqt.com,  
yrn.com, yyg.com, zdp.com, zhd.com,  
zulin.com, zzm.com and Defendants Jinwu  
Chen, Xumin Huang, Feng Lu, Yuhua Jiang,  
Zhilong Chu, Yaoguang Zhu, Yanbin Lin, Yu  
Lin, Xiaofeng Lin, Fengjing Zheng, Xiaoying  
Li, Liwei Liu, Dongdong Xu, Teng Wang,  
Yang Gao, Xiaohang Shen, Feng Yan*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 25th day of March 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Rebecca J. Stempien Coyle (VSB 71483)  
Levy & Grandinetti  
Suite 304  
1120 Connecticut Ave., N.W.  
Washington, D.C. 20036  
(202) 429-4560  
Fax: (202) 429-4564  
mail@levygrandinetti.com

*Counsel for Associated Recovery, LLC*

*/s/ Eric Y. Wu*

---

Eric Y. Wu, VSB No. 82829  
Dentons US LLP  
1900 K Street, NW  
Washington, DC 20006  
202-496-7500 (phone)  
202-496-7756 (fax)  
eric.wu@dentons.com

*Counsel for Domain Names 028.com,  
fny.com, kgj.com, kmq.com, kxq.com,  
kxw.com, lnm.com, luohe.com, meq.com,  
pixie.com, qmh.com, sqg.com, vcz.com,  
wyd.com, xaq.com, xff.com, xsg.com,  
ycx.com, ygx.com, yjr.com, yqp.com,  
yqt.com, yrn.com, yyg.com, zdp.com,  
zhd.com, zulin.com, zzm.com and  
Defendants Jinwu Chen, Xumin Huang,  
Feng Lu, Yuhua Jiang, Zhilong Chu,  
Yaoguang Zhu, Yanbin Lin, Yu Lin,  
Xiaofeng Lin, Fengjing Zheng, Xiaoying  
Li, Liwei Liu, Dongdong Xu, Teng Wang,  
Yang Gao, Xiaohang Shen, Feng Yan*